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July 2, 2018

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *Hachem v. General Electric Co. et al.*, No. 17-cv-8457-JMF

Dear Judge Furman:

We are Lead Counsel for Lead Plaintiff Sjunde AP-Fonden and the putative class in the above-referenced securities litigation pending before Your Honor against General Electric Company ("GE") and write to request an extension of time to file the Third Amended Complaint in this action. We have met and conferred with counsel for Defendants, who agree to this request. No previously extensions have been sought, and the parties are not presently scheduled to appear before this Court.

On May 29, 2018,¹ the Court appointed Sjunde AP-Fonden as Lead Plaintiff and Kessler Topaz Meltzer & Check LLP as Lead Counsel to represent the putative class in this action (*see* ECF No. 139). Pursuant to the May 29, 2018 Order, the Court instructed Lead Plaintiff to file a Third Amended Complaint forty-five days from the date of the order. Accordingly, Lead Plaintiff's Third Amended Complaint is due to be filed by July 13, 2018.

Since our client was appointed Lead Plaintiff, we have continued to pursue an investigation of the facts underlying this matter on behalf of Lead Plaintiff and the class, including interviewing former employees of GE and attempting to confirm allegations attributed to confidential witnesses in the Second Amended Complaint, filed by Arkansas Teachers Retirement System (the former Lead Plaintiff in this action). To date, we have been unable to reach or speak with certain former GE employees previously referenced in the Second Amended Complaint. In light of summer schedules and the upcoming Fourth of July holiday, and to allow further time to conduct its investigation and attempt to speak with the former employees referenced in the Second Amended Complaint, Lead Plaintiff seeks a modest extension of time, until July 23, 2018, to file the Third Amended Complaint.

¹ The order is dated May 29, 2018 but was entered on May 30, 2018 (ECF No. 139).

July 2, 2018
Page 2



We met and conferred with counsel for Defendants between June 28 and 29, 2018, regarding this request, and Defendants agree to the extension sought. We respectfully request that Your Honor grant this request.

Respectfully submitted,

s/ Gregory M. Castaldo
Gregory M. Castaldo

cc: All Counsel of Record (via ECF)